

STEVEN G. KALAR
Federal Public Defender
NED SMOCK
Assistant Federal Public Defender
555 - 12th Street
Suite 650
Oakland, CA 94607-3627
Telephone: (510) 637-3500
Counsel for Defendant HERNANDEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR- 12-702 PJH
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER PERMITTING PASS FOR TIME
vs.)	AT STORAGE FACILITY
)	
ERASMO HERNANDEZ,)	
)	
Defendant.)	
_____)	

On October 25, 2012, this Court ordered that Erasmo Hernandez be released from custody to reside at the home of his wife in Concord. The Court ordered that Mr. Hernandez would be subject to electronic monitoring and would be on lockdown.

Mr. Hernandez has been home for almost six months. He has been confined to the house save for Narcotics Anonymous meetings and English language classes. This Court has also permitted him to spend one hour per day exercising outdoors.

Last weekend, Mr. Hernandez was permitted to spend part of one day at a storage facility near his home so that he could go through and organize his belongings as he prepares to go into custody. Mr. Hernandez needs additional time to complete this process and therefore requests permission to go to A-1 Storage in Concord between 9:00 a.m. and

1 3:00 p.m. on this Saturday, April 27, 2013.

2 Neither Mr. Hernandez's United States Pretrial Services Officer or the government
3 object to this request.

4
5 Dated: April 24, 2013

_____/S/
NED SMOCK
Assistant Federal Public Defender

6
7 Dated: April 24, 2013

_____/S/
CHINHAYI CADET
Assistant United States Attorney

8
9
10
11
12
13
14
15 **~~PROPOSED~~ ORDER**

16
17 Good cause appearing therefore, it is the ORDER of this Court that the release
18 conditions of defendant Erasmo Hernandez shall be modified to permit him to go to the
19 storage facility in Concord on Saturday, April 27, 2013 between 9:00 a.m. and 3:00 p.m.

20
21 Dated: April 26, 2013



HON. KANDIS WESTMORE
United States Magistrate Judge